

JAP:TF

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

12-582 M

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)  
and 960)

SHABANI KHAMISI JABU,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTOPHER CHEN, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 17, 2012, within the Eastern District of New York and elsewhere, defendant SHABANI KHAMISI JABU did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:<sup>1</sup>

1. On or about June 17, 2012, the defendant SHABANI KHAMISI JABU arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Air France Flight 6 from Paris, France.

2. Defendant SHABANI KHAMISI JABU was selected for a Customs and Border Protection ("CBP") examination. He presented a khaki "Japan Express" suitcase. During a routine inspection, an officer noticed that the suitcase was unusually heavy and the sides were unusually heavy. Subsequent inspection revealed that the lining of the suitcase contained a brown, powdery substance that field-tested positive for the presence of heroin. The defendant was placed under arrest.

3. The total approximate gross weight of the heroin found in defendant SHABANI KHAMISI JABU's suitcase is 7,393 grams.

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<sup>1/</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that  
defendant SHABANI KHAMISI JABU be dealt with according to law.

S/ Christopher Chen

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CHRISTOPHER CHEN  
Special Agent  
U.S. Department of Homeland Security  
Homeland Security Investigations

Sworn to before me this  
18<sup>th</sup> day of June, 2012

S/ Viktor Pohorelsky

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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK